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8 IN THE UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 REFLEX MEDIA INC., a Nevada
11 Corporation, *et al.*,

12 Plaintiffs,

13 v.

14 RICHMEETBEAUTIFUL HOLDING
15 LTD., a Maltese corporation d/b/a
16 RichMeetBeautiful.com, *et al.*,

Defendants.

Case No. 2:18-cv-01476-APG-EJY

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO STAY DISCOVERY
PENDING THE COURT'S DECISION ON
DEFENDANTS' MOTION TO DISMISS**

(First Request)

17 Plaintiffs Reflex Media, Inc. (“Reflex”) and Clover8 Investments PTE. LTD. (“Clover8,”
18 and together with Reflex, “RMI”), and Defendants RichMeetBeautiful Holding LTD., d/b/a
19 RichMeetBeautiful.com (“RichMeetBeautiful”); Digisec Media Limited (“Digisec”), and Sigurd
20 Vedral’s (Vedral, and together with RichMeetBeautiful and Digisec, the “RMB Defendants”), by
21 and through their respective counsel of record, hereby respectfully stipulate to stay all discovery
22 in this action pending the Court’s decision on the RMB Defendants’ Motion to Dismiss Amended
23 Complaint (ECF No. 37), as set forth below:

24 WHEREAS, on June 20, 2019, the RMB Defendants filed their Motion to Dismiss
25 Amended Complaint (ECF No. 37) (“Motion to Dismiss”), which has not yet been decided or set
26 for hearing by this Court.

1 WHEREAS the pending Motion to Dismiss includes issues of personal jurisdiction that,
2 once resolved, could require serial rather than simultaneous discovery exchanges on all parties.
3 In the context of a pending motion to dismiss for lack of personal jurisdiction, “courts are more
4 inclined to stay discovery because it presents a critical preliminary question.” *Hologram USA,*
5 *Inc. v. Pulse Evolution Corp.*, No. 2:14-CV-00772-GMN, 2015 WL 1600768, at *1 (D. Nev. Apr.
6 8, 2015) (quotations and citations omitted).

7 WHEREAS to avoid potentially inefficient discovery, the parties have met and conferred
8 and agree that a stay of discovery pending the Court’s decision on RMB Defendants’ Motion to
9 Dismiss Amended Complaint is appropriate and will conserve Judicial and party resources. Once
10 the Motion to Dismiss is resolved, the parties will meet and confer and submit a Joint Proposed
11 Discovery Plan.

12 WHEREAS this is the first stipulation to stay discovery.

13 THEREFORE, THE PARTIES HEREBY STIPULATE AND PROPOSE THE
14 FOLLOWING ORDER:

15 All discovery in this action shall be stayed pending the Court’s decision on the RMB
16 Defendants’ Motion to Dismiss Amended Complaint (ECF No. 37).

17 Once the Motion to Dismiss is resolved, the parties will meet and confer and submit a Joint
18 Proposed Discovery Plan. Respectfully submitted,

19 DATED: March 6, 2020

SMITH WASHBURN, LLP

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11 DATED: March 6, 2020

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Meng Zhong

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8 *Attorneys for Defendants Richmeetbeautiful*
Holding Ltd. Dba RichMeetBeautiful.com,
Digisec Media Limited, and Sigurd Vedral
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12 IT IS SO ORDERED.
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ELAYNA J. YOUCAH, UNITED STATES MAGISTRATE JUDGE

DATED: March 9, 2020